



March 1, 2023

By ECF

The Honorable Denise L. Cote  
United States District Judge  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: *United States v. Patrick Ndukwe, et al.,*  
**S1 21 Cr. 700 (DLC)**

Dear Judge Cote:

We represent Michelle Martin in the above-referenced matter. We respectfully write the Court to request that Ms. Martin be permitted to appear for the arraignment scheduled for Friday, March 3 at 3pm either telephonically or via video link (or, in the alternative, that she be excused from the conference and permitted to be arraigned at a later date while her counsel appears at the Friday's conference).

Last week, the Government sought and obtained a superseding indictment that requires the arraignment of Ms. Martin. Trial is presently scheduled for approximately a month from now. Ms. Martin, who is indigent, lives upstate near Syracuse and works an hourly job at an auto supply store. She is scheduled to work on Friday would miss her entire shift if she were required to travel to New York City for what will likely be a brief conference. Counsel has reviewed the superseding indictment with her at length and she intends to enter a plea of not guilty at the conference.

We appreciate the Court's consideration of this request.

Respectfully submitted,

*United. The defendant  
must appear in person.*  
\_\_\_\_\_  
/s John Zach \_\_\_\_\_  
JOHN ZACH  
ERICA N. SWEETING  
Attorneys for Michelle Martin

cc: Kedar S. Bhatia  
Jarrod L. Schaeffer  
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3/1/23

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